

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

JOHNATHON IRISH

)
)
) DOCKET NO. 19-CR-251-LM
)
)
)

**REQUEST FOR JURY INSTRUCTION ON DEFENDANT'S
CONSTITUTIONAL RIGHT NOT TO TESTIFY**

Defendant Johnathon Irish respectfully requests that the Court give the model instruction on the defendant's constitutional right not to testify. Irish requests this instruction, in an abundance of caution, conditioned about the defendant's exercise of his constitutional right not to testify. The submission of the within requested instruction constitutes no indication that he does or does not intend to testify.

Defendant
Johnathon Irish
By his Attorney,

/s/ Benjamin L. Falkner
Benjamin L. Falkner (NH Bar No. 17686)
KRASNOO, KLEHM & FALKNER LLP
28 Andover Street, Suite 240
Andover, MA 01810
(978) 475-9955 (telephone)
(978) 474-9005 (facsimile)
bfalkner@kkf-attorneys.com

Dated: February 11, 2020

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the within document upon the attorney of record for the Government via the Court's ecf system on February 11, 2020.

/s/ Benjamin L. Falkner

Benjamin L. Falkner